

## **REMARKS**

By this amendment, no claims have been amended, cancelled, or added. Hence, Claims 1-9, 13-22, and 26 are pending in this application.

## **THE CLAIM REJECTIONS**

Claims 1-2, 4-9, 13-15, 17-22, and 26 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,687,733 by Manukyan et al. ("*Manukyan*").

Claims 3 and 16 were rejected under 35 U.S.C. § 103(a) as allegedly being obvious in view of *Manukyan* and U.S. Patent Application No. 2002/0178254 by Brittenham et al. ("*Brittenham*").

The Applicant respectfully traverses.

## **THE PENDING CLAIMS ARE PATENTABLE OVER THE CITED ART**

Each of the pending claims recites at least one element that is not disclosed, taught, or suggested by the cited art, either individually or in combination.

### **Independent Claim 1**

With regard to independent Claim 1, there is recited:

In a process comprising at least one activity, a computer implemented method for performing an activity, comprising:

**receiving a message, from a process management engine, to perform an activity which calls for invocation of a service provided by a service application, said service being invocable using a protocol, and said service, when invoked, provides one or more results of performing said service;**

obtaining a service definition for said service, wherein the service definition comprises mapping information that maps one or more attributes associated with said activity to one or more parameters used by said service, wherein said service definition for said service comprises an indication that said protocol is to be used to invoke said service;

selecting a first set of logic, from a plurality of sets of logic, based upon said indication in said service definition for said service, wherein said first set of logic implements said protocol;

executing said first set of logic which implements said protocol to generate a service invocation, wherein said service invocation is generated based upon, at least a portion of, said mapping information in the service definition, and is in compliance with said protocol;

**sending said service invocation to said service application to invoke said service;**

receiving a reply from said service application which comprises said one or more results; and

**providing at least a portion of said one or more results to said process management engine to complete performance of said activity** (emphasis added).

At least the above-bolded features of Claim 1 are not disclosed, taught, or suggested by the cited art.

Claim 1 provides an advantageous method for performing an activity. According to Claim 1, a message to perform an activity that calls for the invocation of a service is received from a process management engine. The service, when invoked, provides one or more results of performing the service. A service definition for the service is obtained. The service definition comprises mapping information that maps one or more attributes associated with the activity to one or more parameters used by the service. The service definition for the service comprises an indication that the protocol is to be used to invoke the service. A first set of logic is selected based on the indication in the service definition. The first set of logic implements the protocol. The first set of logic is executed to generate a service invocation. A service invocation is generated based upon at least a portion of the mapping information in the service definition. The generated service invocation is sent to a service application to invoke the service. A reply, from the service application, which comprises the one or more results of performing the service, is

received. At least a portion of the one or more results is provided to the process management engine to complete the performance of the activity.

By encapsulating the logic that maps one or more attributes associated with the activity to one or more parameters used by the service in the mapping information, when the requirements of the service change, the mapping information may be updated to reflect the requirements of the changed service without developing new code to support the invocation of the changed service. In this way, substantial time and effort for developing new code to support the changed service is avoided. Further, since the information contained in the service definition is fairly basic, in terms of substance and technical complexity, the service definition may be created by a relatively low-skilled end user, rather than a highly skilled technical specialist.

On the other hand, *Manukyan* is directed towards sharply contrasting subject matter. *Manukyan* discloses an approach for automatically configuring a client-server network. In *Manukyan*, a client communicates with an interactive server. The interactive server runs a server daemon to make a service available to the client. The server daemon is programmed to automatically configure configuration files of the interactive server to reflect account information associated with a client. In this way, the client may selectably add, remove, or modify the services available from the server daemon by manipulating the account information in the configuration files of the interactive server (see Abstract).

Applicant admits to being perplexed about how to respond to the inconsistency between the evidence required to support a novelty rejection, and the evidence that has been offered by the Office Action relating to the present application. Specifically, to support a novelty rejection, the Applicant would expect an argument that has the following form: (1) element X is shown in reference A, (2) element Y is shown in reference A, and so on.

However, the Office Action does not support the novelty rejections in that manner. Rather, to support the novelty rejections, not only has each claim been divided into its constituent elements, but also each constituent element of the claim has been finely dissected into a set of short phrases and sentence fragments. The Office Action then points out how each individual fragment corresponds to a similar fragment in different portions of a reference without any consideration as to the relationship between the fragments, the meaning of the elements as a whole, and the meaning of the claim as a whole. This is not permissible. MPEP § 2106, II, C states:

[W]hen evaluating the scope of a claim, every limitation in the claim must be considered. Office personnel may not dissect a claimed invention into discrete elements and then evaluate the elements in isolation. Instead, the claims as a whole must be considered. (emphasis in original).

To illustrate, Claim 1 recites the element of “receiving a message, from a process management engine, to perform an activity which calls for invocation of a service provided by a service application, said service being invocable using a protocol, and said service, when invoked, provides one or more results of performing said service.” Rather than citing a portion of *Manukyan* that discusses this subject matter as a whole, the Office Action instead argues:

- receiving a message, from a process management engine is taught by Col. 3, line 5,
- to perform an activity which calls for invocation of a service provided by a service application is taught by Col. 10, lines 5-14,
- said service being invocable using a protocol is taught by Col. 9, lines 16-24, and
- said service, when invoked, provides one or more results of performing said service is taught by Col. 3, lines 7-8; make service available.

Finely dissecting the claim element in this manner eviscerates the meaning of the subject matter recited in the claim element because the subject matter in its entirety is not alleged to be shown by *Manukyan*. For example, the Office Action does not allege that any portion of *Manukyan* teaches, “receiving a message, from a process management engine, to perform an activity which calls for invocation of a service provided by a service application, said service being invocable using a protocol, and said service, when invoked, provides one or more results of performing said service.”

In addition, there are numerous logical inconsistencies in the Office Action. For example, to show the first element of Claim 1 discussed above, the Office Action argues that “receiving a message, from a process management engine” is taught by “Col. 3, line 5 (interactive server).” Thus, the argument of the Office Action requires that the process management engine as claimed be analogous to the interactive server of *Manukyan*. However, this portion of *Manukyan* lacks any teaching of a message from a process management engine, let alone receiving a message to perform an activity which calls for invocation of a service provided by a service application as required by the first element of Claim 1.

The Office Action also argues that “to perform an activity which calls for invocation of a service provided by a service application” is taught by Col. 10, lines 5-14 of *Manukyan*. Although it is not clear what, if anything, is analogous to a service as claimed, it appears to the Applicant that the Office Action is arguing that a service as claimed is allegedly analogous to a function performed by interactive server 44. However, this portion of *Manukyan* lacks any teaching of receiving a message as claimed from an interactive server. Consequently, the Office Action has not explained how *Manukyan* teaches or suggests “receiving a message, from a process management engine, to perform an activity which calls for invocation of a service

provided by a service application, said service being invocable using a protocol, and said service, when invoked, provides one or more results of performing said service” because, among other reasons, the Office Action has not shown how *Manukyan* teaches receiving a message, let alone receiving a message as recited in this element.

Also, since the Office Action argues the service as claimed is a function performed by the interactive server of *Manukyan*, the rejection of the Office Action requires that the service application be analogous to interactive server 44 because, as recited in Claim 1, the service is provided by the service application.

However, the portion of *Manukyan* cited to show “sending said service invocation to said service application to invoke said service” (Col. 10, lines 7-35) does not discuss sending anything to the interactive server 44 to invoke functions performed by the interactive server 44. Instead, this cited portion merely discusses configuring configuration files 58. A configuration file is not analogous to a service invocation because a configuration file does not invoke a service. At best, a configuration file may describe how a service is to be performed once it is invoked, but a configuration file does not itself invoke a service. Consequently, this element cannot be disclosed, taught, or suggested by *Manukyan*.

Additionally, Claim 1 recites the element of “providing at least a portion of said one or more results to said process management engine to complete performance of said activity.” However, the argument of the Office Action requires that the process management engine be analogous to the interactive server, and the one or more results of performing the service be analogous to one or more results of performing a function of interactive server. Thus, to be consistent, the argument of the Office Action must be that *Manukyan* teaches this element by a showing of providing at least one or more results of performing a function of the interactive

server to the interactive server to complete performance of the activity that calls for invocation of the service provided by the interactive server. This is nonsensical, and is not supported by the teachings of *Manukyan*. Consequently, this element cannot be disclosed, taught, or suggested by *Manukyan*.

Additionally, it is noted that the Office Action is not consistent in its interpretation of a service definition as recited in Claim 1. For example, the argument provided for the element of “obintaining a service definition” requires that a service definition be analogous to service list 61 of *Manukyan*. However, the argument provided for the element “selecting a first set of logic” requires that a service definition be analogous to configuration files 58 of *Manukyan*. Thus, the logic of the Office Action is not consistent in how the elements of Claim 1 are construed. Thus, if the term service definition were to be consistently construed, then based on the arguments presented by the Office Action, either “obtaining a service definition” or “selecting a first set of logic” would not be disclosed, taught, or suggested by *Manukyan*.

Consequently, it is respectfully submitted that at least one element of Claim 1 is not disclosed, taught, or suggest by the cited art. Therefore, Claim 1 is patentable over the cited art and is in condition for allowance.

#### **Claims 2-9, 13-22, and 26**

Independent Claim 14 contains features similar to that discussed above with reference to Claim 1, except that Claim 14 is recited in computer-readable medium format. Consequently, it is respectfully submitted that for at least the reasons given above with respect to Claim 1, that Claim 14 is also patentable over the cited art and is in condition for allowance.

Claims 2-9, 13, 15-22, and 26 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 2-9, 13, 15-22, and 26 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 2-9, 13, 15-22, and 26 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.



## CONCLUSION

It is respectfully submitted that all of the pending claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. If there are any additional charges, please charge them to Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

Respectfully submitted,

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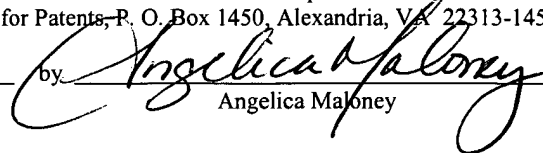
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on March 31, 2006

by



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